

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997)

POSTAL RATE COMMISSION
Docket No. R97-1
OFFICE OF THE SECRETARY

VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.
AND CAROL WRIGHT PROMOTIONS, INC.,
DESIGNATION OF ORAL AND WRITTEN CROSS-EXAMINATION
OF UNITED STATES POSTAL SERVICE WITNESS MOELLER (USPS-T36)
(October 7, 1997)

Written Cross Examination

Pursuant to Rule 4A of the Postal Rate Commission's Special Rules of Practice
(Presiding Officer's Ruling No. R97-1/4), Val-Pak Direct Marketing Systems, Inc., and Val-
Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc., d/b/a "Cox Direct,"
hereby designate the following responses to interrogatories as their written cross-examination
of Postal Service Witness Moeller:

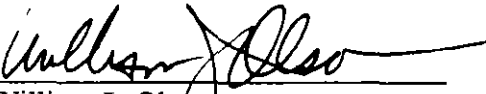
VP-CW/USPS-T36-1-10, 20-23
AAPS/USPS-T36-1, 5-6
ABA&EEI&NAPM/USPS-T36-3-4
DMA/USPS-T36-1
MASA/USPS-T36-5
NAA/USPS-T36-9, 14-16, 28, 33-35, 39, 41, 43-46, 51, 55
OCA/USPS-T36-19, 21-26

Pursuant to Rule 4A, two copies of the above documents are submitted herewith to the
Secretary of the Commission.

Additionally, these intervenors request the right to designate at the hearing additional
responses to other discovery to this witness, the responses to which have not yet been received.

Oral Cross-Examination

Further, pursuant to Rule 4B of the Special Rules of Practice, Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc. and Carol Wright Promotions, Inc., request permission to follow up on oral cross-examination of Witness Moeller conducted by other parties, and to conduct oral cross-examination regarding his testimony and responses to interrogatories (especially those identified above), including its written cross-examination and the following specific subjects: his testimony regarding rate design for Standard A ECR.



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Carol Wright Promotions, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



William J. Olson

October 7, 1997